FARM BUREAU CONSERVATION PLAN ESTIMATED EFFECTS

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			Conerve	ed with I		Cons	erved on	Farm				On-farm		
Yr	Amount Trans- ferred	Syst Cap Exp	inter- ceptors	seep-	with IID Sys	Farm Incent Exp	with Farm Incent	Spec Proj Exp	with Spec'l Proj's	System Cum	On-farm Cum	plus System Cum	"Other" Conser- vation	Υr
A	В	c	D	E	F	G	н	1	J	K	L	М	N	0
1	20									0	0	0	20	1
2	40	-2		0						0	0	0	40	2
3	60	-8		3						3	0	3	57	3
4	85	-13		3 6						9	0	9	76	4
	110	-20		6						15	0	15	95	3 4 5
5		-22	10.5	•	3	-4	-			25.5	3	28.5	101.5	
6	130 150	-23	10.5		6	-8				36	9	45	105	7
	175	-23	12.5		9	-14	2			48.5	20	68.5	106.5	8
8		-23	15.5		11	-19	6	-1		64	37	101	99	9
9	200	-17	10.5		10	-26	15	-5		74.5	62	136.5	88.5	10
10	225	-9	12		10	-31	15	-8	3	86.5	90	176.5	53.5	11
11	230	-8	13.5		11	-37	15	-13	4	100	120	220	15	12
12	235		13.5		6	-39	15	-14	6	100	147	247	-7	13
13	240				3	-39	12	-17	6	100	168	268	-23	14
14	245				•	-40	8	-20	7	100	184	284	-34	15
15	250					-40	5	-22	8	100	197	297	-42	16
16	255					-40	3	-23	8	100	208	308	-48	17
17	260					-40	2	-23	8	100	218	318	-53	18
18	265					-40	1	-23	8	100	227	327	-57	19
19	270					-40	1	-23	8	100	236	336	-61	20
20	275	-				-40	-	-23	7	100	243	343	-63	21
21	280					-40		-23	7	100	250	350	-65	22
22	285					-40		-23	7	100	257	357	-67	23
23	290		100			-40		-23	7	100	264	364	-69	24
24	295					-40		-23	6	100	270	370	-70	25
25	300					-40		-23		100	210	010		
	5,170		85	15	70		100		100		Totals		198	

Expenditures in \$ Millions in RED (Columns C, F, & H)

Acre Feet of water in 1,000's in BLACK

"Other" Conservation does not include amount IID's use would exceed 3.1 MAF without transfer

It is estimated this conservation will result in the following reductions

Canal spills & seepage: -100 KAF
Tailwater: -200 to -210 KAF
Tilewater / deep perc: -60 to -70 KAF

March 18, 2002

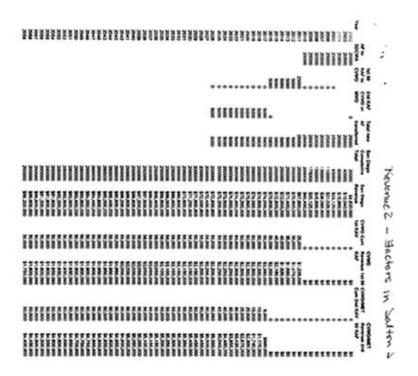
The Bratton Plan ("Defanging the F-word")

Premise: If fallowing is inevitable, let the IID do the fallowing in the name of efficiency and on behalf of the people of the Imperial Valley.

- 1. The Imperial Irrigation District should lead any fallowing program in the Imperial Valley, rather than simply enabling it.
 - A) The IID is owned by the people and that means everybody.
- B) The District must satisfy "reasonable and beneficial" provisions of the state water code and the Law of the River.
 - C) Water marketing, like deregulation of the power industry, is politically dead.
- Farmland with a history of marginal utility and high water usage should be purchased by the IID and converted to some other job-producing enterprise.
- A) A premium should be paid for any land to be fallowed by the District, providing a financial inducement to the landowner.
- B) The resulting "wet water" would be available for transfer to the coastal plain; the fallowed land would, in turn, be placed into an economic development zone.
- It isn't enough to make the Imperial Valley whole after fallowing; instead, it should be made better.
- A) Farmers would benefit from lower water rates and the complete elimination of the water availability charge.
 - B) The community would benefit from job-creation associated with any transfer.
- C) The IID would benefit from a program that satisfied its responsibility to use water "reasonably and beneficially."

Conclusion: The above plan is simple, understandable and, more importantly, would preserve local control. The benefits would be broadly distributed to produce the greatest good for the greatest number, which, in the end, ought to be the goal of any fallowing program adopted by the IID.

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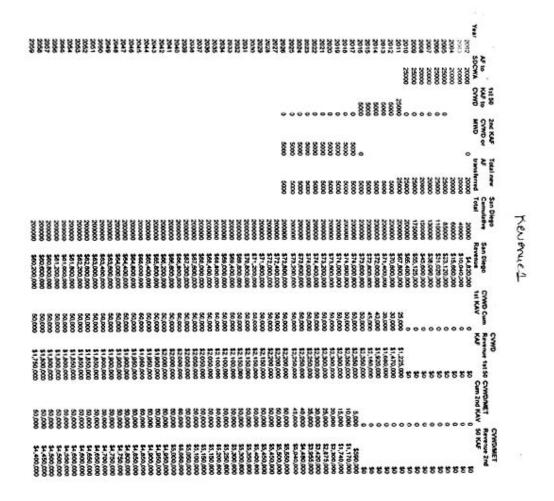
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The same	2075	2074	2073	2072	2071	2070	2009	2068	2067	2000	2005	1	2063	2062	1905	2060	Year SOCWA	¥ 10	•
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																	transferred	4	Total new
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13,950,000		~ 23	7. 	7 (6)	e Si	~ V	T C	a V	T S	о 8			i i	~	Ť		88	Revenue 2nd	CVMDMET

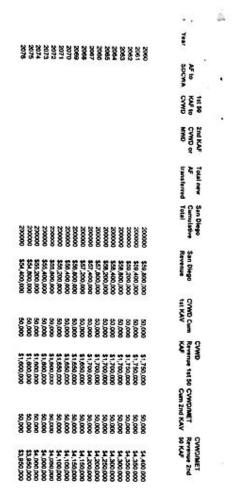
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See 548 607	\$59,950,000	\$60,350,000	\$60,800,000	\$61,000,000	\$61,450,500	\$61,950,000	\$62,150,000	\$62,600,000	\$63,000,000	\$63,300,000	000,000,000	\$64,150,000	\$64,400,000	\$64,000,000	\$45,300,000	965,500,000	\$65,950,000	Total Gross A Revenue to IID II from all c sources ti
	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	75000	Acres needed if all conservation thru fallowing
	23162	22848	22538	2222	21910	21507	21284	2007	2005	2034	2000	19711	1940	19091	18780	16467	1815	Acres out due to city growth to 2940 (50% savings)
					8					100			_		1			ID Cost to purchase land for fallowing @\$2500 acrs avg.
	0 \$59,950,000	0 \$60,350,000		000,000,100	930	*	5		_	*	565	ï	0 \$54,400,000	0 \$54,860,000	*	-	0 \$65,950,000	Nel Revenue Phased purchase
	\$59,950,000	\$60,050,000						\$62,600,000	\$83,000,000	\$63,300,000	\$63,700,000	\$64,150,000	\$64,400,000	\$64,000,000	\$65,300,000	900,000,000	\$65,950,000	One-time purchase (\$3,286 acres at \$2500 aa)
	\$87,450,000	\$87,450,000	\$87,450,000	\$87,450,000	\$87,450,000	\$87,450,000	\$87,450,000	\$87,450,000	_	~		\$87,450,000			\$87,450,000	\$57,450,000	\$87,450,000	Crop losses, phased failuring (Aug. loss \$1166 per acre)
	\$27,500,000	-\$27,100,000	\$26,650,000	-\$26,450,000	-\$26,000,000	-\$25,500,000	-\$25,300,000	-\$24,850,000	\$24,450,000	-\$24,150,000	423,750,000	-\$25,300,000	423,050,000	422,650,000	422,150,000	-\$21,800,000	421,500,000	Net (loss) gain to Economy
					279				286	287	289	291	292	294	296	297	299	PHOS
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					2 81	2	9		7			8	55	*	6 67	5 67	8	CYMO MET 2nd 56 KAF

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Total Great	A STATE OF THE PARTY OF THE PAR	Acres out due	ID Cost to		Net Revenue	Coro losses				
from all	Hall contervation	to city growth	for fullowing	Net Revenue	purchase \$3.286 acres	phased fallowing	Net Boss pain to	AWOUN	CVWD	CAMB
sources	thru fallowing	(signives	and .	purchase	at \$2500 ea)	per acre)	Economy	Prices	Ę	50 FE
\$4,820,000	3552	0		-\$4,060,995	-\$128,385,000	\$4,142,096	-\$3,203,091	241		
\$10,040,000	718	313	568,088,68	\$1,159,005	-5118.350,000	\$8,284,182	47,125,187	12	50	130
\$15,660,000	10657	626	\$8,880,995	\$6,779,005	\$102,695,000	\$12,426,283	45,047,282	3		
\$31,020,000	19508	1252	\$11,101,243	\$19,018,757	-\$79 575,000	\$17,603,908	\$5,005,151	2772		100
\$38,090,000	23091	1565	\$6,860,995	220	\$10 465,000	\$26,923,623	\$2,000,77	282	8:	8
\$45,600,000	28643	1878	\$6,680,995	_	\$35 135,000	\$31,065,719	\$5,653,286	30	8:	
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corress thru fallowing savings)		B12500 acre	371	Phase	(53,285 acres at \$2500 ea)	(Avg. loss \$1166 per acre)	Het doss) gain to SDCWA Economy Prices	Prices	E E	0282590	MET 2nd
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CITY HALL 400 Main Street • Plaza Park Brawley, California 92227 Phone: (760) 344-9911 FAX: (760) 344-0907

APR 2 9 2002

April 26, 2002

Bruce D. Ellis Bureau of Reclamation Phoenix Area Office (PXAO-1500) P.O. Box 82269 Phoenix, AZ 85069-1169 Elston Grubaugh Manager of Res./Managment/Planning Imperial Irrigation District P.O. Box 937 Imperial, CA 92251

Re: Comments on the Draft Environmental Report/Environmental Impact Statement (DEIR/EIS) for Imperial Irrigation District Water Conservation Plan

Dear Sirs:

The City of Brawley does not desire to manufacture reasons to oppose the water transfer. There can logically be no growth inducing impacts. Southern California has been using the water for 25 years, and the dust storm fears can clearly be mitigated by sprinklers leaching the salt out of the exposed lake bed. However, this points out the one clear failure of the project, there is no dedicated, on going, revenue stream to deal with environmental problems as they occur.

It is clear that you cannot burden the project with the whole load of "Saving the Sea," endangered species, fish hatcheries, dust control, etc. etc. But it is equally clear that if there is not a significant amount dedicated to these causes, the project will not go forward. We suggest that 25% of the cash flow from the transfer would be an appropriate amount to dedicate to environmental projects.

In addition, we would like to emphasize one point. Throughout the negotiations on this and previous water transfers, the communities of Imperial County have been promised that the transfers will not adversely affect the local economy. All water would be conserved by on farm and system improvements. As stated by Rodney Smith, in his testimony before the California Water Resources Control Board, "This would create 650 jobs and \$20 million in annual personal income." Fallowing to create the water would cause "direct job losses of 1,400." (Imperial Valley Press April 24, 2002) The proposal, "Save the Sea by fallowing," as stated by Tom Kirk, Don Cox, etc., would be an enormous catastrophe to Imperial County cities.

Letter - L15. City of Brawley Economic & Community Development. Signatory - John R. Benson.

Response to Comment L15-1

The EIR/EIS is intended to identify all mitigation measures which should be implemented in connection with the Proposed Project.

It is anticipated that mitigation measures to be implemented by farmers in connection with the on-farm conservation program will be included in the contracts between IID and participating farmers. The comment that these on-farm costs should be included in calculating costs for purposes of exercising any IID termination right or "off-ramp" is noted.

It is anticipated that the IID Board will evaluate the risks and costs of the Project before committing to proceed and that farmers will evaluate the advantages and disadvantages of the voluntary on-farm program before deciding to participate.

Response to Comment L15-2

The EIR/EIS is intended to identify all mitigation measures which should be implemented in connection with the Proposed Project.

It is anticipated that mitigation measures to be implemented by farmers in connection with the on-farm conservation program will be included in the contracts between IID and participating farmers. The comment that these on-farm costs should be included in calculating costs for purposes of exercising any IID termination right or "off-ramp" is noted.

It is anticipated that the IID Board will evaluate the risks and costs of the Project before committing to proceed and that farmers will evaluate the advantages and disadvantages of the voluntary on-farm program before deciding to participate.

Response to Comment L15-3

Comment noted.

L15-2

L15-1

L15-3

Bruce D. Ellis, Bureau of Reclamation Elston Grubaugh, Manager of Res./Management/Planning, Imperial Irrigation District April 26, 2002 Page 2

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Finally, all of the comments pointing to all of the hazards of the transfer say nothing of the greatest hazard of all, cancelling the deal and having it imposed on us by administrative fiat. We believe that MWD is counting on Imperial Valley being too dumb and disorganized to finalize the transfer, and they will get the water for free. The Secretary of Interior will cut our entitlement to 2.6 million acre feet, and there will be no money for conservation, environmental projects, or anything else. Please don't let this happen.

Sincerely,

John R. Benson

Member of the City Council

JRB:j

Letter - L15 Page 2

Response to Comment L15-4

Reclamation will have to comply with the ESA, NEPA, and the Clean Air Act. If IID is unable to obtain permits because of inability to comply with these statutes, then Reclamation will also not be able to cut IID's entitlement. IID has established that it is meeting or exceeding efficiencies of other irrigation districts in the west.

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